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March 31, 2004

Mr. J. I. Palmer, Jr., Regional Administrator
U.S. EPA, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

Dear Mr. Palmer:

The Early Action Compact requires local areas to submit Early Action Plans to the United States Environmental Protection Agency (EPA) by March 31, 2004. To fulfill that required milestone, this package contains the local area plans as well as information regarding statewide activities that contribute to bringing cleaner air to the citizens of South Carolina.

Both the 2007 future year modeling emissions inventory and the attainment maintenance analysis have been completed. Information regarding these two Early Action Compact (EAC) milestones, as well as information regarding the modeled control cases is contained in the *DRAFT 8-hour Ozone Modeling Analysis and Attainment Demonstration for South Carolina's Early Action Compact, Technical Support Document*, March 2004. This document will be finalized and submitted to EPA as a part of the Early Action SIP, December 2004. A copy of the *Technical Support Document, Executive Summary* can be found in Enclosure 1. The *Technical Support Document* and associated files can be found on the enclosed disk. South Carolina has invested significant resources to conduct a statewide 8-hour ozone modeling analysis. Modeling results demonstrate that all areas of South Carolina will attain the 8-hour ozone standard by 2007. In fact, modeling results indicate a 12 percent statewide average decrease in ozone levels. In addition, a modeling analysis for 2012 demonstrates continued attainment. The results of this modeling validate the regional modeling done by EPA, which also demonstrated attainment for all South Carolina areas. Work is currently underway on a modeling run using estimated 2017 emissions. This work is being done to review attainment issues beyond the mandated 2012 time frame.

South Carolina has also implemented a comprehensive ozone-forecasting program that covers twenty-nine of the state's forty-six counties, including those most vulnerable to higher ozone levels. Citizens in those counties are advised on a daily basis about predicted air quality so that they can take actions to protect their health. In addition, South Carolina is an original partner with EPA on the AIRNow project, which allows the current and forecast ozone and particulate matter air quality information to be available to citizens statewide.

The South Carolina General Assembly passed, and Governor Sanford signed, a joint resolution endorsing Early Action Compacts and encouraging state agencies to lead by example and develop programs that focus on reduction in ground-level ozone. At the end of 2002, 45 of South Carolina's 46 counties had entered into Early Action Compacts to implement ozone reduction strategies earlier than federally required. These counties, along with other government entities, industry, environmental groups, and other stakeholders have worked together both at the local level and state level to develop strategies to reduce ozone pollution. These efforts affirm our commitment to improve air quality for all of South Carolina. In fact, the stakeholders involved in this early action process identified 675 initiatives to obtain ozone reductions at a local level. To ensure that future growth does not adversely affect South Carolina's ability to meet the 8-hour ozone standard, the state is on schedule to impose regulations to address NO_x.

emissions from new and existing stationary sources and open burning activities statewide. These requirements will have the potential of reducing and preventing the addition of over 5,500 tons of NO_x to the state's current emissions inventory.

The South Carolina Department of Health and Environmental Control (Department) has also been working with the largest existing industrial sources in the more vulnerable areas of South Carolina to reduce NO_x emissions. These efforts will result in a reduction of 12,458 tons per year in NO_x emissions from 8 facilities, and these reductions will be captured through permit limits. Detailed information regarding the specific facilities and the respective reductions will be included in South Carolina's Early Action SIP submittal, December 2004.

Department air officials have been proactive in planning for improved air quality in the state and in the region. In 2001, it became apparent that there was a significant interest by the utility industry in the I-85 corridor of South Carolina due to the location of the natural gas pipeline and access to the electrical power grid. The Department began to receive numerous power plant permit applications. As this was a vulnerable area with regards to ground-level ozone, the numbers of permit applications and the potential impact of these sources on the area's ability to meet the 8-hour ozone standard became an utmost concern. The Department determined that authorizing the large amounts of additional NO_x emissions that were proposed by these and other similar large NO_x sources would not be appropriate without a showing that these additional emissions would not adversely impact this area. As a result of this determination, NO_x emissions estimated at 3610 tons per year have not been authorized.

In addition to the milestones for identifying and adopting early control measures established in the EAC, one condition set by EPA Region 4 for York, Chester, and Lancaster counties participation, requires that South Carolina continue to actively participate in the Charlotte Region Integrated Air Quality Management Pilot Project. This project has since been renamed "Sustainable Environment for Quality of Life" (SEQL) and the Department is an active partner in this project. Further, the Department has entered into a Memorandum of Understanding with the North Carolina Department of Environment and Natural Resources to improve air quality in the Charlotte region.

To ensure air quality goals are considered in all transportation plans, programs and projects, the Department is working closely with Federal Highways, EPA Region 4, South Carolina Department of Transportation and local Metropolitan Planning Organizations. While this effort, referred to as "Smart Highways," is not a strategy that will result in emission reductions, it will provide the citizens of South Carolina the assurance that air quality goals are considered in transportation improvements.

The Department anticipates having plans in place by April 2005 for statewide compliance with 8-hour ozone standards, well before EPA's deadline of April 2007 with attainment for some marginal and moderate areas in 2007 and 2009, and until 2024 for areas with the worst air quality.

Enclosed you will also find the local Early Action Plans completed by participating counties and a progress report update of emission reduction strategies for the Department. This information will be available on our website as soon as possible. Enclosure 2 includes the updated progress report for the Department and Enclosure 3 includes the final local Early Action Plan for each participating county, grouped by the following areas:

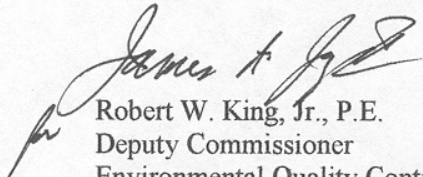
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Appalachian: Anderson, Cherokee, Greenville, Oconee, Pickens, Spartanburg
Catawba: Chester, Lancaster, Union, York
Pee Dee: Chesterfield, Darlington, Dillon, Florence, Marion, Marlboro
Waccamaw: Georgetown, Horry, Williamsburg
Santee Lynches: Clarendon, Kershaw, Lee, Sumter
Berkeley-Charleston-Dorchester: Berkeley, Charleston, Dorchester
Low Country: Beaufort, Colleton, Hampton, Jasper
Lower Savannah: Aiken, Allendale, Bamberg, Barnwell, Calhoun, Orangeburg
Central Midlands: Fairfield, Lexington, Newberry, Richland
Upper Savannah: Abbeville, Edgefield, Greenwood, Laurens, Saluda

Local stakeholder groups continue to meet and upon request, the Department attends as many of these meetings as possible to offer technical assistance and updates regarding the 8-hour ozone standard and the early action process.

To date, the early action process has been a positive experience for South Carolina. The awareness of air quality issues has reached an all-time high and is expected to increase as the local areas implement education and outreach initiatives. Thank you for the assistance and support EPA has provided in this process. We look forward to continuing to work with EPA as we implement measures to achieve cleaner air sooner for our citizens. Should you have questions or desire additional information, please do not hesitate to contact me at (803) 896-8940 or Henry Phillips, of my staff at (803) 898-3260.

Sincerely,



Robert W. King, Jr., P.E.
Deputy Commissioner
Environmental Quality Control

Enclosures: 1. *DRAFT 8-hour Ozone Modeling Analysis and Attainment
Demonstration for South Carolina's Early Action Compact, Technical Support
Document, March 2004*
 2. South Carolina's March 2004 Progress Report Update
 3. Local Early Action Plans for Participating Areas

cc: Kay Prince, EPA Region 4
 County Officials (no attachments*)
 Ron Methier, GA Dept. of Natural Resources (no attachments*)
 Keith Overcash, NC Dept. of Environmental and Natural Resources (no attachments*)
 EQC District Directors (no attachments*)
 Henry Phillips (no attachments*)

*All those not receiving attachments will be notified when materials are placed on website.